

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

TELEXFREE, INC.,
TELEXFREE, LLC,
JAMES M. MERRILL,
CARLOS N. WANZELER,
STEVEN M. LABRIOLA,
JOSEPH H. CRAFT,
SANDERLEY RODRIGUES DE VASCONCELOS,
SANTIAGO DE LA ROSA,
RANDY CROSBY and
FAITH R. SLOAN,

Defendants,

and

TELEXFREE FINANCIAL, INC.,
TELEXELECTRIC, LLLP and
TELEX MOBILE HOLDINGS, INC.,

Relief Defendants.

**CHAMBERS
COURTESY COPY**

Case No. 1:14-civ-11858-NMG

FILED
IN CLERKS OFFICE
2017 SEP 14 AM 9 02
U.S. DISTRICT COURT
DISTRICT OF MASSACHUSETTS

**PLAINTIFF'S MOTION FOR LEAVE TO FILE
SECOND AMENDED COMPLAINT**

Pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure, plaintiff Securities and Exchange Commission ("the Commission") moves for leave to file a Second Amended Complaint in the form submitted herewith as to those defendants remaining in the case..

The Second Amended Complaint is intended to correct two errors. First, as set forth in paragraph 5 of the original Complaint (ECF #2) and the Amended Complaint (ECF #128), the Commission alleges that all defendants violated Section 5 of the Securities Act of 1933

Motion allowed. s/AM Gorton, USDJ 9/28/17